

BB

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

JUN 18 2008 *aw*
JUN 18 2008
MICHAEL W. DOBINS
CLERK, U.S. DISTRICT COURT

Scott Hildreth

2007-0028801

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

08CV3506
JUDGE CASTILLO
MAGISTRATE JUDGE BROWN

vs.

(To be supplied by the Clerk of this Court)

COOK COUNTY

COOK COUNTY

Salvador Godinez Director CEDOC
SALAZAR

Former Supt Dir. of Salazar

Supt. Dir. of Thomas THOMAS

CRW Mr. Butler. BUTLER

Salvador Godinez

Former Supt SALAZAR

Dir. of Supr THOMAS

CRW BUTLER

Sgt. Neppa

Law Enforcement 1 2 7

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: SCOTT Wilder
- B. List all aliases: N/A
- C. Prisoner identification number: 2097-0028801
- D. Place of present confinement: COOK COUNTY Jail Div 9
- E. Address: 2650 E. Calhoun Ave Chicago, IL 60648

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Salvador Godinez
 Title: Director Cook Co Dept Corr
 Place of Employment: Cook Co.
- B. Defendant: J Salazar
 Title: Former Supt Div 9 CCB
 Place of Employment: Cook Co.
- C. Defendant: Supt Div 9 Thomas
 Title: Supt Div 9
 Place of Employment: Cook Co.

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 07C 4696 / 08C 1461
- B. Approximate date of filing lawsuit: Aug 20 07 / Feb 15 08
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Sgt. Kuntz
- D. List all defendants: Conkco Furniture CCSP.
Christopher McCabe
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): SAME
- F. Name of judge to whom case was assigned: Kennedy / Carrillo
- G. Basic claim made: 1st and 2nd / 3rd of 4th
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): partly BOTE
- I. Approximate date of disposition: ?

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ADA.

From Jan 08 to Dec 08 I have been
denied any rights or a notice of ADA

American with Disabilities Act 42 USC 12101 et seq.

I filed a writ of habeas in Jan 08 he did
nothing no response answer or after I asked
asked them several times? to read
now Supr Prisoner Jones says

I want to work with the courts, I want
to find a way to

need help.

ACCESS TO COURTS

Being denied access to courts for months. Prisoner Rights to

court cases, just staff have security and taking the time to

meet with the Prisoner the taking is it is up to the Prisoner who

wants to be a defendant Rights of a Prisoner who is a criminal

just has a security guard, and the court and the judge will come

prosecuting me

A.D.A.

I am writing this for Scott Cause of his Disability.
 Claim: From Jan^{8th} 2008 to date MAY^{31st} 2008 I have
 been denied any Relief of a Nature of A.D.A
 Americans with disabilities act. 42 USC 12101 et seq.
 I filed it with Superintendant div. 9, Mr Salazar
 approx. Jan^{8th} 2008 he did Nothing, No Response,
 threw it out. CRLW butler asked he about
 it several times, to no avail.

Now, New Supt. Div 9 Thomas is doing the
 Same thing "Nothing"

~~ACCESS TO COURTS~~

~~I am being denied also my right of ACCESS TO COURTS for months
 & filed numerous grievances. COPIES of JAIL STAFF BOOK SECURITY and
 library. Personnel think they can provide what they want
 when they want so that discrimination constitutional rights are not
 Federal act on this & have suffered in court cases delayed
 and humiliated my defense both my disability and personal
 life ACCESS TO COURT has been with deliberate indifference
 The Supt Div 9 Mr Thomas makes no attempt to a
 medical issue~~

I'd like an INJUNCTION to relieve either #3 or 4
 in my Proposal of expense or cost ~~of~~ C.D. and
 compensatory damages ~~of~~ \$5,000 - and
 punitive \$3,000
 Run costs of Demand or ACCESS to court
 \$2,400 - 28,000 - emergency drug
 and 10,000 - future drug.

Relief:

Due to the CCAD complete indifference
 to my condition and Ref. let., and refusal to
 admit or even try to cure saying out
 Run February 08 to June approx. 2nd
 ask for the Ref. in Relief.

That CCAD provide me at their expense
 a laptop more Book/Word Processor
 compatible to download with Printer system
 in Dist. 9 line handy.

and \$5,000 each month or not
 covering all capital and personal
 ordered by Court immediately
 run/ru

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I'd like an ^{injunction} ~~injunction~~ ^{for #4} ~~for #4~~ in my
 Proposed and a compensatory damages ^{\$50,000} ~~\$50,000~~
 punitive damages ^{\$32,000} ~~\$32,000~~
 I'd like an ~~injunction~~ ^{injunction} for number 3 or 4 in my
 PROPOSAL compensatory damage ^{\$50,000} ~~\$50,000~~ punitive damage ^{\$32,000} ~~\$32,000~~
 Address: ~~12345 Main St~~ ^{12345 Main St} ~~Anytown, CA 90001~~ ^{Anytown, CA 90001}

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6 day of June, 2008

Scott Hildreth

(Signature of plaintiff or plaintiffs)

SCOTT HILDRETH

(Print name)

2007-0020801

(I.D. Number)

Box 089002

Cupo, IL 60008

(Address)

Feb. 08

DISABLED PRISONERS. Prisoners with disabilities or handicaps are protected both by the Constitution and by federal statutes. Under the Constitution, prison officials must meet the medical needs of disabled prisoners and furnish the assistance that they require in order to live a minimally decent life in prison. As one court put it, "the prison authorities must take the prisoner as they find him and provide facilities compatible with his physical condition that meet civilized standards of decency."

RUIZ V. ESTELLE 503 F.Supp 1265

Disabled prisoners have greater rights under the Americans with Disabilities Act of 1990 (ADA).

42 U.S.C. § 12101 et seq.

ADA applies to any public entity. A "public entity" is defined in the ADA as including "any State or local government" or "any department, agency, special purpose district, or other instrumentality of a State or States or local government. This definition clearly includes correction departments and other agencies that operate prisons and jails.

COUGHLIN 145 F.R.D. 339

To take advantage of the ADA, you must be a "qualified individual with a disability." "Disability" under the ADA means:

- (A) a physical or mental impairment that substantially limits one or more of the major life activities of [an] individual;
- (B) a record of such impairment; or
- (C) being regarded as having such an impairment.

A "qualified individual with a disability" is one who

with or without reasonable modification to rules, policies, or practices, the ~~removal~~ of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities...

The rights ~~the~~ the ADA provides to prisoners are broader than those guaranteed by the Constitution in several respects.

First, the statute requires defendants to change the way they operate, to provide additional services, and to make physical renovations if necessary to avoid excluding disabled persons from programs and services. The Rehabilitation Act standard, which will almost certainly be applied under the ADA, calls for "reasonable accommodations" to permit handicapped persons to participate in prison programs.

Accommodations are only deemed unreasonable if they impose "undue financial and administrative burdens" or require "a fundamental alteration in the nature of [the] program." This is a much more favorable standard than the "reasonable relationship" test of *Turner v. Safley*, under which prison officials are entitled to avoid "ripple effects" on fellow inmates or on prison staff, and prisoners must propose alternatives with "de minimis cost" in order to win.

Second, prisons may not engage in blanket exclusions of whole classes of prisoners from certain activities. They must make individualized judgments as to what individuals are "qualified."

Third, prisons may not give in to the perceptions or fears of inmates and staff. As noted above, the ADA specifically protects those who are "regarded" by others as having a disability, as well as those who actually have one.

The ADA requires the federal government to promulgate regulations implementing the statute. These regulations spell out in more detail what public entities must do to comply with the statute. These obligations include conducting self-evaluations of their compliance and adopting a procedure for handling complaints.

You are not required to exhaust administrative remedies before suing under the "public entity" provisions of Title II of the Americans with Disabilities Act. The relief available includes equitable relief (an injunction) and back pay; we believe that damages are available also.

LETTER OF INFORMATION ON PROPOSAL

ACCORDING to (42 USC § 12101 et seq) "Americans with Disabilities Act" (4 pages info attached) I am entitled to assistance, for my problem writing due to Parkinson's Disease. It impairs my ability to communicate with my attorney, family, court, and C.C-T-CRW, mail room, C/O's, grievances, clothing, administration, anything, etc...

I am entitled to a reasonable solution.

I propose the following:

- 1) I be allowed to use typewriter in Law Library at least 3 times a week, for 2 to 3 hours each time;
OR
- 2) A typewriter be brought up to 9-3H^E (or store room on 3H) for my use 6 to 9 hours per week;
OR
- 3) I am provided with a laptop word processor, and able to download once a week, and print;
OR
- 4) I be allowed to receive direct from a vendor a Canon portable typewriter AC/DC, very small approximately 10 1/2" x 12" x 1 1/4". This kind of typewriter used to be sold on commissary on IDOC.

Regarding proposal #4 on previous page, I require the following :

- a) A permit allowing me to possess and use and retain said Canon Typewriter, so it will not be confiscated by staff in a shake-down and/or as contraband.
- b) Two sets of batteries for said Typewriter.— extra set to be held as deemed appropos (?)
- c) Two extra ribbon cartridges for Typewriter.

Thank you for your consideration

Sincerely 3-1308
Buck

Reply
Required

mc GUNE LINK CARD ?

C ~~TRK~~ Sent out ? AT RICS or in TRK ?

Need Transcript in Desk Bottom Drawer
Papers in front case in garage Bench or 1st fl Papers
written + typed.

Glasses ?

Stacy

STUFF RECP

CAR AND SPARKS + Kenwood case TCD Lyrer
have stored in shed. CDs in Room Bledick
+ link only in garage at case. in TRK + hand box ?

SELL

BILLER 6000

~~Angels~~

comp

INS 100- ?

5901 TRUNKS 600 75-

★

COURT ORDER

Law Library 3X5 wk minimum

PSYC. evaluation Elgin JUDGE ?

glasses

meds.

ADDERAL Reborn

★

PUB DRK. cost ahead with APP DRK. 94

need PL. Dredd looking 630 221 3400

Papers in wood front case in garage at Dredd
Transcript + Papers in Buller's 2 Drawing.

94CP 7231

What kind of

1. *Style*
 2. *Design*
 3. *Material*
 4. *Color*
 5. *Texture*
 6. *Shape*
 7. *Size*
 8. *Weight*
 9. *Volume*
 10. *Form*
 11. *Space*
 12. *Time*
 13. *Value*
 14. *Quality*
 15. *Quantity*
 16. *Intensity*
 17. *Duration*
 18. *Frequency*
 19. *Amplitude*
 20. *Phase*
 21. *Wavelength*
 22. *Frequency*
 23. *Amplitude*
 24. *Phase*
 25. *Wavelength*
 26. *Frequency*
 27. *Amplitude*
 28. *Phase*
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 31. *Amplitude*
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 34. *Frequency*
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 37. *Wavelength*
 38. *Frequency*
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 86. *Frequency*
 87. *Amplitude*
 88. *Phase*
 89. *Wavelength*
 90. *Frequency*
 91. *Amplitude*
 92. *Phase*
 93. *Wavelength*
 94. *Frequency*
 95. *Amplitude*
 96. *Phase*
 97. *Wavelength*
 98. *Frequency*
 99. *Amplitude*
 100. *Phase*

~~CHANGE VENUE spent about 7~~

~~LAW FIRM HING PROHIBIT MROH CASE?~~
~~CONFIDENTIAL~~

~~Quash Strathmore~~

(2-123) ALIBET Human serv skating Township. 1922 comp 14
very fine PRK Bridge Pits on octan mine mine. ROAD DL

RIGOR IN CONDUCT AND ACCUSATIONS? ^{as Rep. B. V. C.}
line up for blame ^{as Rep. D. W. C.}

Plasma in custody was 1711 10pm until then CCS
found 2 black suspect? 5'8" who who? came with white
American limo from back up? who drove the car
Approach was noticed when 1200-500 men approached?
Special Squad? Return with computers on
with no movement?

when did you know you were different? But he.
 How is it for you? I am sure you are
 again and I and I have the same feeling, it
 when you find that you are different?

Did he threaten you verbally? Threaten to hurt you?
 Is it your testimony the man correlated in your
 MASH book? That is, when young white man -
 crew were out. Had you ~~to~~ Mr. Scott? Color eyes
 when apprehended you had he more Rist sitting aside
 switched up of ~~calm~~ ~~you~~ ~~and~~ ~~there~~ ~~would~~?
 what was it more like man Braddock clear-headed
 (w.) to know or work there

was it by force or ~~unjust~~ ~~unjust~~
Did the person say things like you have been
so the company we have been
we could not have given to the company
Did you refuse to go to the school or to the factory
to go?

TRD
Dane
Curt

(3)

When RESTORED

20070028801

P. 9 2F

would be on number 3 on page 7

Did he know the name of the person?

Did he know the name of the person?

* He was born 9356

Did he know the name of the person?

He was born in the state of New York

* Did he know the name of the person?

* Did he know the name of the person?

He was born in the state of New York

* Did he know the name of the person?

GLASSES - LAW FIRM High Profile media

Did the Throat

~~Did he TARGET TO HURT [unclear] thing~~

after 1st time you helped you up and again?

not hold on you whole time 1957 when.

But he holds it up to you in a direct manner and
the danger lies in ^{being} ~~being~~ exposed in that way

~~But he told you things like he would overtake~~
~~you as he was going, and then come back and tell you~~
~~he had done your place about 7 o'clock a P.M.~~

And the Sup for extraction, is you? correct?

150
most. on column ~~2nd~~ 1st 2 when passing
whole. The wire that you see in back
color ^{EYES} EYES. Are they a same ~~as~~ the 2

DARYL - Glasses, white clothes (ing store)
Post corr. - Transcript VISIT

Right to continue accession
NEWS PAPER ARTICLES ?

Did you ever say NO STOP let you go
guaranteed tolerance
(I'm not the alone for a while don't know)
but in the tolerance?

Scott Wilson
vs
McBurren

no. 07C4696

5-19-08

Judge Kennelly,

ATTACHED IS A PROPOSITION FOR AN ADA,
Complaint & quest to CLDOC. For some relief
or assistance in my inability to write due
to my Parkinson's disease. I cannot write well
to function daily with instructions / matters
or correspond with family. ~~also (RABBY)~~
or most important ~~the~~ ^{ADDITIONAL} COSTS
in BOTH civil and most of all criminal.
I need help in them all and proposed
it seems not Peter more than case
or understand
can you function or in function
are ok my proposed 27 relief sought
best to

There is no text I include 3 pages

or other examples of my
writing

Sanction or in function

for Relief Sought ps. 5B